

REMARKS

This application has been carefully reviewed in light of the Office Action dated March 3, 2006 ("Office Action"). Claims 1 to 38 are presented for examination, of which Claims 1, 34, and 35 are independent. Reconsideration and further examination are respectfully requested.

Claims 1 to 38 were rejected under 35 U.S.C. § 103(a), primarily over U.S. Patent 5,218,455 ("Kristy") in view of U.S. Patent 6,393,206 ("Yagi"). In rejecting certain ones of the dependent claims, the Office Action additionally relied on one or more of the following patents: U.S. Patent 6,031,976 ("Koakutsu"); U.S. Patent 5,764,870 ("Manico"); U.S. Patent 5,930,465 ("Bellucco"); U.S. Patent 6,289,416 ("Fukushima"); U.S. Patent 6,421,782 ("Yanagisawa"); "Inside Adobe Photoshop" by Bouton, et al. ("Bouton"); U.S. Patent 6,085,195 ("Hoyt"); U.S. Patent 5,949,411 ("Doerr"). The rejections are respectfully traversed.

Independent Claim 1 recites a method for authoring a plurality of digital image records, each digital image record corresponding to a separate customer order, in a digital image record authoring system including a dedicated computer. The method comprises a scanning step, a processing step, and a writing step. The scanning step scans a plurality of images corresponding to a separate customer order from a scanner into a plurality of digital images. The scanner is connected to the dedicated computer by a first high-speed image data interface bus. The processing step processes the plurality of digital images and combines the processed plurality of digital images into a record image. The writing step writes the record image by an image-recorder to a medium. The

image-recorder is connected to the dedicated computer by a second high-speed image data interface bus different from the first high-speed image data interface bus. The scanning step is repeated, prior to completion of the writing step, to scan a new plurality of images corresponding to a new customer order from the scanner into a new plurality of digital images, such that transfer of the new plurality of digital images over the first high-speed image data interface bus and transfer of the record image over the second high-speed image data interface bus occur simultaneously.

Independent Claim 34 defines a method similar to Claim 1, including the features of a scanner connected to a dedicated computer by a first high-speed image data interface bus and an image-recorder connected to the dedicated computer by a second high-speed image data interface bus different from the first high-speed image data interface bus, and a scanning step that is repeated, prior to completion of a writing step, such that transfer of the new plurality of digital images over the first high-speed image data interface bus and transfer of the record image over the second high-speed image data interface bus occur simultaneously. Claim 34 also specifies that the record image, which is passed from the dedicated computer to the image-recorder, is passed at a constant rate.

Independent Claim 35 includes a scanning step, an adjusting step, a generating step, a processing step, and a CD-writing step, and also includes the features of a scanner connected to a dedicated computer by a first high-speed image data interface bus and an image-recorder connected to the dedicated computer by a second high-speed image data interface bus different from the first high-speed image data interface bus, and a scanning step that is repeated, prior to completion of a writing step, such that transfer of the

new plurality of digital images over the first high-speed image data interface bus and transfer of the record image over the second high-speed image data interface bus occur simultaneously.

The applied references are not seen to disclose or to suggest the features of independent Claims 1, 34, and 35, and in particular, are not seen to disclose or to suggest at least the features of a scanner connected to a dedicated computer by a first high-speed image data interface bus and an image-recorder connected to the dedicated computer by a second high-speed image data interface bus different from the first high-speed image data interface bus, and a scanning step that is repeated, prior to completion of a writing step, such that transfer of a new plurality of digital images over the first high-speed image data interface bus and transfer of a record image over the second high-speed image data interface bus occur simultaneously.

The Office Action concedes that Kristy does not disclose that an image-recorder is connected to the dedicated computer by a second high-speed image data interface bus different from a first high-speed image data interface bus, and a scanning step that is repeated, prior to completion of a writing step, such that transfer of a new plurality of digital images over the first high-speed image data interface bus and transfer of a record image over the second high-speed image data interface bus occur simultaneously. (Office Action, page 4).

To address this deficiency of Kristy, the Office Action relies on Yagi. Specifically, the Office Action contends that Yagi discloses a second high-speed image data interface bus connecting a receiver 9 to a control unit 1 (see Figure 16 (9→7) of Yagi)

and a first high-speed image data interface bus connecting a disc access unit 3 to control unit 1 (see Figure 16 (3→7)). (Office Action, page 5). The Office Action further points to column 20, lines 23 to 33 to contend that Yagi discloses transfer of a new plurality of digital images over the first high-speed image data interface bus and transfer of a record image over the second high-speed image data bus occur simultaneously. (Id.)

However, Applicants respectfully submit that the Office Action mischaracterizes Yagi, since column 20, lines 23 to 33 of Yagi refers to the internal operations of disc access unit 3, and thus is not seen to disclose anything regarding Figure 16 (9→7) or Figure 16 (3→7). Specifically, the cited portion of Yagi relates to reading and writing using switches 3e and 3d and track buffers 3a1 to 3a4 in disc access unit 3. (See also, column 19, line 56 to column 20, line 22 of Yagi).

Moreover, even assuming Yagi's reading and writing in disc access unit 3 using switches and track buffers relates to Figure 16 (9→7) or Figure 16 (3→7), and Applicants do not concede this, Yagi's switches 3e and 3d and track buffers 3a1 to 3a4 are not seen to disclose or to suggest transfer of a new plurality of digital images over a first high-speed image data interface bus and transfer of a record image over a second high-speed image data interface bus occur simultaneously.

The remaining references are not seen to cure the deficiencies of Kristy and Yagi. Specifically, the remaining references are not seen to disclose or to suggest anything that, when combined with Kristy and/or Yagi, would have resulted in the presently claimed invention. Accordingly, independent Claims 1, 34 and 35 are believed to be allowable.

The other claims in the application are each dependent from the independent claims and are believed to be allowable over the applied references for at least the same reasons. Because each dependent claim is deemed to define an additional aspect of the invention, however, the individual consideration of each on its own merits is respectfully requested.

No other matters being raised, it is believed that the entire application is fully in condition for allowance, and such action is courteously solicited.

Applicants' undersigned attorney may be reached in our Costa Mesa, California office at (714) 540-8700. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,



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